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July 15, 2025

**Via ECF**

Hon. Lewis J. Liman, U.S.D.J.  
United States District Court for the Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**Re: *Grifols, S.A. v. Yu, et al.*  
No. 1:24-cv-00576-LJL**

Dear Judge Liman,

This firm represents Plaintiff Grifols, S.A. (“**Grifols**”). In advance of the Initial Pre-trial Conference scheduled to take place before the Court on Tuesday, July 22, 2025 at 12 p.m. ET (ECF 54), Grifols, together with Defendants Daniel Yu, Gotham City Research, LLC, General Industrial Partners, LLP, and Cyrus De Weck (collectively, “**Defendants**”), respectfully submits the enclosed Proposed Case Management Plan and Scheduling Order (the “Proposed Scheduling Order”) for the Court’s consideration.

All proposed deadlines within the Proposed Scheduling Order have been agreed upon between the parties. Consistent with the requirement set forth in Paragraph B of Court’s Individual Practices in Civil Cases, the parties identify the following proposed deadlines in the Proposed Scheduling Order that deviate from default timing set forth in the Court’s rules:

- **Deadline for Service of Rule 26(a)(1) Initial Disclosures:**
  - **Default:** 14 following the Initial Pre-trial Conference.
  - **Proposed Modification:** August 22, 2025.
- **Deadline for Close of Fact Discovery:**
  - **Default:** 120 days following the Initial Pre-trial Conference.
  - **Proposed Modification:** August 1, 2026.
- **Deadline for Close of Expert Discovery:**
  - **Default:** 45 days from the Completion of Fact Discovery.
  - **Proposed Modification:** December 1, 2026.
- **Deadline to File Motions for Summary Judgment**
  - **Default:** 14 days from Completion of All Discovery.
  - **Proposed Modification:** January 29, 2027.

The parties respectfully submit that these proposed modifications from the Court’s default rules are necessary and appropriate given the availability of counsel and the parties in the coming



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summer months, the nature of the claims at issue, the international location of several of the parties, and potential translation issues that may arise with respect to document discovery.

We thank the Court for its time and consideration, remain available should Your Honor or any member of Your Honor's staff have questions. Otherwise, we look forward to appearing before Your Honor on July 22, 2025.

Respectfully,

*/s/Peter Doyle*

Peter Doyle